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ENVIRONMENTAL
CLEANUP

FEB 24 2014

Mr. Keith Johnson
Northwest Region Office
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, Oregon 97201-4987

Re: DEQ Downgrade of Former Rhone Poulenc Facility from High to Medium Priority, Portland Harbor Superfund Site, Portland, Oregon

Dear Mr. Johnson:

It has been brought to my attention that DEQ downgraded the source control priority of the Rhone Poulenc site from a high priority site to a medium priority site in the January 31 Milestone Report for Upland Source Control at the Portland Harbor Superfund Site. I am writing to request that DEQ give this source a higher priority.

Under the February 2001 Memorandum of Understanding, DEQ has lead responsibility for the upland contamination and for coordinating with the EPA on upland contamination which may impact the river. Through this coordination, the EPA has received numerous project reports and our concerns on the conceptual site model (CSM) for the groundwater pathway from the former Rhone Poulenc facility have been documented in letters to DEQ following reviews of project submittals. With the State's Upland Source Control Summary Report planned for mid-2014 and EPA's Portland Harbor Proposed Plan scheduled for release to the public in 2015, the EPA is concerned that we will not be able to determine the potential impacts from this site to an in-water remedy for the Willamette River with the existing groundwater database.

The reasons provided by DEQ for its downgrade in the 2013 Milestone Report are based on StarLink Logistics Inc.'s (SLLI) mapping and evaluation of groundwater plumes, interim groundwater source control work, and their contention of generally low concentrations of bioaccumulative chemicals in groundwater discharging to the Willamette River. The EPA has raised numerous concerns regarding the CSM for contaminant transport and fate in groundwater in both comment letters provided to DEQ and meetings that DEQ has attended over the past few years. Based on the EPA reviews of recent reports for this site, the EPA believes that the groundwater pathway needs to be high priority for the following reasons.

The former Rhone Poulenc plant area is located at 6200 NW St. Helens Road and is approximately 2000 feet from the Willamette River. Rhone Poulenc formulated and manufactured herbicides (1945 to 1982) and insecticides (1945 to 1972) at the property. While it is understood that other properties with documented releases exist around the Rhone Poulenc property and add complexity to site characterization and source control evaluation efforts, Rhone Poulenc contaminants of interest (COIs) have been identified in both the RI/FS human health and ecological risk assessments as risk drivers for in-water remedial actions in the River in the locality of the site.

Groundwater samples collected by SLLI have been analyzed for one or more of the following constituent classes during sampling events over the past few decades: VOCs, SVOCs, metals, herbicides, OCIs, OPIs, PCDDs/PCDFs, PCBs, and petroleum hydrocarbons. Monitoring wells on adjacent properties were included in these sampling events. Due to the extensive list of monitoring parameters and the large resulting water-quality database, the EPA developed a short list of marker chemicals for consideration in reviewing the water-quality database to assess transport and fate of COIs in groundwater from SLLI's source areas to the River. During this exercise, the EPA determined that groundwater monitoring at the site over the years had not been performed in a fashion that follows groundwater characterization guidance as the water-quality database is limited from both spatial and temporal standpoints. Additionally, while there have been numerous groundwater sampling events at the site, the events are based on a monitoring well network that is inadequate to define the nature and extent of COIs and to adequately characterize transport and fate of COIs from source areas to the River. Due to the extent of the water-quality database and the potential for groundwater COIs to also be sourced from other nearby Doane Lake area sites, the EPA defined marker chemicals for the Rhone Poulenc site: 1,2-DCB; 1,4-DCB; Silvex; Eldrin; 2,4-D; 2,3,7,8-TCDD;and arsenic. Using Mining Visualization Software (MVS) modeling of water-quality results for the marker chemicals, the EPA has determined that the MVS outputs clearly show that three marker chemicals (1,2-DCB; 1,4-DCB; and Silvex) have a continuous pathway from source areas at the Rhone Poulenc site to the River; SLLI representatives have concurred with this determination. Other marker chemicals appear to be less conclusive with regards to pathways to the River but data shows that elevated levels of 2,4-D; Endrin; 2,3,7,8-TCDD; and arsenic are present in source areas associated with a historical storm drain (sump) and the Lake Area Drainage Ditch; these marker chemicals also appear to be elevated at locations near the major storm sewer alignments and outfall locations (22B and 22C). Even assuming comingling of SSLI's contamination with releases from other upland source areas in the greater Doane Lake area, there is sufficient evidence to conclude that SLLI's releases in groundwater are discharging to the River and/or an imminent threat to discharge such that this pathway for all known groundwater source areas must be a high priority for complete characterization and remedial action.

In EPA's February 2012 review of SLLI's Draft Remedial Investigation/Source Control Evaluation Report, a number of issues with groundwater data and concerns with data evaluations and presentations were raised. To date the EPA has not been presented with data and/or other evidence that can refute many of the questions we raised on the CSM for contaminant transport and fate in groundwater in comments delivered to DEQ or in presentations and/or discussions at meetings with DEQ and SLLI representatives. The EPA believes that aspects of SLLI's groundwater CSM are inconsistent with the well-documented hydrogeologic characteristics determined by reports and interim actions at adjacent downgradient uplands source control sites. In our most recent discussions with the parties, SLLI representatives "agreed to disagree" with the EPA on our CSM assessments/concerns. We received a response from SLLI to our April 18 and May 13 letters on the CSM issues and have seen no information within their letter that changes the positions we previously stated in meetings and letters.

EPA's recent review of the Feasibility Study Work Plan further supports the need to address the data deficiencies that the EPA has identified in the CSM. The Work Plan focuses on addressing source areas with minimal acknowledgement of the groundwater pathway to the river. The EPA submitted comments to DEQ on the Work Plan that question the remedial action objectives for the site, further reiterate our concerns with the CSM, and support the need to address deficiencies in the groundwater characterization work performed to date at the site.

The EPA agrees the source control measures at the former Rhone Poulenc facility should move forward with actions to control soil and groundwater sources in the immediate former Rhone Poulenc facility area in as timely a fashion as possible. The EPA disagrees, however, with the lower priority status for groundwater and is going on record that actions to document the distal extent of the Rhone Poulenc COIs in the alluvial groundwater basin are a necessity in order 1) to define the nature and extent of contamination released from past operational activities at the site and 2) to determine the need for response actions to address contaminated groundwater that discharges to the River. The EPA sees development and implementation of a comprehensive groundwater monitoring plan to address characterization concerns that we have raised as a high priority action. The EPA has made this abundantly clear in recent letters and meetings with DEQ and SLLI representatives.

Additionally, it is also EPA's position that there is a need to revisit the groundwater pump and treat option that was reported on in SLLI's Extended Pumping Test Report and that was recently proposed for abandonment by SLLI representatives. We believe that a well-designed and operated pump and treat system could have immediate benefits in addressing the contaminated groundwater moving from source areas; therefore, the EPA requests that the pump and treat option be reconsidered by DEQ along with reprioritizing the groundwater pathway. The groundwater pathway needs to remain a high priority because there is significant subsurface contamination in soils and groundwater that is migrating from the former Rhone Poulenc facility into the Willamette River.

You can reach me with any questions or comments on this issue at 206-553-7216 or yamamoto.deb@epa.gov.

Sincerely,

Deb Yamamoto

Deb Yamamoto, Manager
Superfund Site Cleanup Unit #2
Remedial Cleanup Program

cc: Mr. Rich Muza, EPA
Mr. Dave Lacey, ODEQ